TSD File Inventory Index

Date: Oct. 6, 2006

Initial: C M Hereld

Facility Name: Cetron Electronics Corporation (Dr Fields / Site)

Facility Identification Number: ILD 005 130 430

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	Y
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

Total — 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: One folder etc.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

APR 5 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

George Snyder, Plant Engineer
715 Hamilton Street
Geneva, IL 60134

RE: Interim Status Acknowledgement USEPA ID No. ILD 005 130 430
FACILITY NAME: Cetron Electronic Corporation

Dear Mr. Snyder:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr.

GRH 4/5/82

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Thomas R. Sweet, Vice President

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD005130430 REACKNOWLEDGEMENT

CETRON ELECTRONIC CORPORATION
715 HAMILTON ST
GENEVA IL 60134

INSTALLATION ADDRESS ➤ 715 HAMILTON ST
GENEVA IL 60134

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 2046-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: ILD005130430

I. NAME OF INSTALLATION: CETRON ELECTRONIC CORPORATION

II. INSTALLATION MAILING ADDRESS: 715 HAMILTON ST
GENEVA, IL 60134

000042 AUG 14 80

III. LOCATION OF INSTALLATION: 715 HAMILTON ST
GENEVA, IL 60134

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD005130430 2 1	A	800813

I. NAME OF INSTALLATION

—

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 —

CITY OR TOWN: 4 — ST.: ZIP CODE:

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 SAME

CITY OR TOWN: 6 ST.: ZIP CODE:

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 SNYDER GEORGE PLANT ENG

PHONE NO. *(area code & no.)*: 312-232-4140

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 PUBLIC STOCK

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD005130430

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

AUG 13 1980

I.D. – FOR OFFICIAL USE ONLY

S														T/A	C
W	I	L	0	0	5	1	3	0	4	3	2			2	1
1	2											13		14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F007				
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U002	U019	U151	U154	P104	U220
37	**38**	**39**	**40**	**41**	**42**
U228					
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
[signature]	Plant Engr.	8-11-80

EPA Form 8700-12 (6-80) REVERSE

Specialists in the Manufacture and Distribution of Electron Tubes and Semiconductors for Industry

ILD005130430

Richardson Electronics, Ltd.
P.O. Box 269 / Geneva, Illinois 60134
Manufacturing Divisions
Phone (312) 232-4300

February 6,1986

United States Environmental Protection Agency
Region V
230 South Dearboron Street
Chicago, IL 60604

Regarding: Facility Name Change

Gentlemen:

Cetron Electronics Corp. (ILD005130430 - 0890350004) of Hamilton Street, Geneva, Illinois and National Electronics (ILD062405204 - 0898030003) of Keslinger Road, LaFox,Illinois have been purchased by Richardson Electronics LTD. an electron tube distributor/warehouse operation.

G, TSD, PA

G, TSD, PA

The Cetron and National names have been retained for trade mark purposes only. Future correspondance to these two facilities should be addressed as: Richardson Electronics Ltd/ Cetron and Richardson Electronics Ltd/National.

If there are any questions or further information is required, please contact us at any time.

Sincerly:

LaMonte Walker

LaMonte Walker
Support Services Manager

O. WMD
cc: RF (cert.-Rou[illegible]
Original Submitted to EPA 3/86

LCW:lre

NOV 2 9 1983

5HW-12

Mr. Thomas R. Sweet
Vice President of Manufacturing
Richardson Electronics, Ltd.
P.O. Box 269
Geneva, IL 60134

Re: Cetron Electronics
ILD005130430

Dear Mr. Sweet:

The United States Environmental Protection Agency has reviewed your request to withdraw your Part A hazardous waste permit application. On the basis of the information you provided, we determined that your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265 (or 35 Illinois Administrative Code Section 725). Therefore, a closure plan must be submitted directly to Mr. Larry Eastep, Permit Section, Division of Land Pollution Control, Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. Requirements for closure are found at 35 Illinois Administration Code 725. Questions on closure should be directed to Illinois EPA at the above address.

Sincerely yours,

Horst Witschonke, Chief
State Technical Unit #1

cc: Mr. Larry Eastep, IEPA
Mr. Bill Radlinski, IEPA

bcc: Part A file
Charles Lewis, State Specialist
Becky Strom, VERSAR

5HW:H.Witschonke:ns:11/23/83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	NS		MCW					
DATE	11/23/83	11/29	11/29/83					

No file copy

Specialists in the Manufacture and Distribution of Electron Tubes and Semiconductors for Industry

Richardson Electronics, Ltd.

P.O. Box 269 / Geneva, Illinois 60134

Manufacturing Divisions
Phone (312) 232-4300

CERTIFIED MAIL - RECEIPT REQUESTED

August 18, 1983

Ms. Zetta Davis
USEPA, Region 5
Hazardous Waste Branch
230 South Dearborn
Chicago, Illinois 60604

ILD 005-130430 PA, G, TSD, PAS
ILD 062405204 PA, G, TSD, PAS

Re: Change in Classification

Dear Ms. Davis:

I am writing this letter on behalf of Cetron Electronics, I. D. Number ILD 005130430 and National Electronics, I. D. Number ILD 062405204.

Mr. Kuykendall (Illinois EPA) notified us by letter that we were in violation because we had not supplied financial responsibility information.

Mr. Andrew Vollmer (EPA, Springfield) told George Snyder, the Cetron Electronics plant manager that we would be required to have a fidelity bond and approximately four million dollars worth of insurance.

After checking the premium cost for these policies we found that it was cost prohibitive. In Mr. Snyder's second call to Mr. Vollmer, he asked Mr. Vollmer how we could change our status and he said we could no longer hold hazardous waste for more than 90 days. He told

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF
DATE 8/25/83

RECEIVED
WASTE MANAGEMENT BRANCH

RECEIVED
8/24/83

Specialists in the Manufacture and Distribution of Electron Tubes and Semiconductors for Industry

Richardson Electronics, Ltd.
P.O. Box 269 / Geneva, Illinois 60134

Manufacturing Divisions
Phone (312) 232-4300

Ms. Zetta Davis
USEPA/Hazardous Waste Branch

Mr. Snyder to write you this letter requesting a change in status and send a copy to him.

Therefore, we are requesting our status be changed from TSD to Generator only and we will no longer hold waste for more than 90 days.

Very truly yours,

RICHARDSON ELECTRONICS, LTD.

Thomas R. Sweet
Vice President of Manufacturing

TRS/hs
xc: Mr. Andrew Vollmer
IEPA, Springfield

print or type in the unshaded areas only
(areas are spaced for elite type, i.e., 1 ...racters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD 0 0 5 1 3 0 4 3 0

T/A C D

LABEL ITEMS

II. EPA I.D. NUMBER	•ILD005130430
III. FACILITY NAME	CETRON ELECTRONIC CORPORATION
V. FACILITY MAILING ADDRESS	715 HAMILTON ST GENEVA IL 60134
VI. FACILITY LOCATION	715 HAMILTON ST GENEVA IL 60134

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced** terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP CETRON ELECTRONIC CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 George Snyder PLANT ENG.	312 232 4140

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 715 Hamilton St.			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 Geneva, Ill.		60134	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 715 Hamilton St.			
B. COUNTY NAME			
Kane			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE** *(if known)*
6 GENEVA,	IL	60134	

EPA Form 3510-1 (6-80)

FEB 18 1981

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3673 (specify) ELECTRONIC COMPONETS	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: CETRON ELECTRONIC CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE

0 (specify) Public Stock Corp.

D. PHONE (area code & no.): A 312 584 1321

E. STREET OR P.O. BOX: 715 Hamilton street

F. CITY OR TOWN: Geneva

G. STATE: IL

H. ZIP CODE: 60134

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N	**D. PSD** (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	**E. OTHER** (specify): 9 (specify)
C. RCRA (Hazardous Wastes): 9 R	**E. OTHER** (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF ELECTRON TUBES

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-17-81

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

784

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S		T/A	C
F	I L D 0 0 5 1 3 0 4 3 0		1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8	6 5	0 1	0 1

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 2	300	G	
2	S 0 1	1,000	G	
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

S												T/A	C
W	I	L	D	0	0	5	1	3	0	4	3		1

FOR OFFICIAL USE ONLY

S												T/A	C				
W	D	U	P										2	D	U	P	

II. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	14,664.000	P	S02	
2	U002	1,650.000	P	S01	
3	U154	1,975.000	P	S01	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S												T/A	C
F	I	L	D0	0	51	3	04	3	0				6
1	2									12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
4	1	5	3	4	00	0	88	1	8	5	00
65	66	67	68	69	71	72	74	75	76	77	79

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
C E 15 16 -------- ----------	55 56 - 58 59 - 61 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F 15 16 -------- 45	C G 15 16 --------- 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-18-81

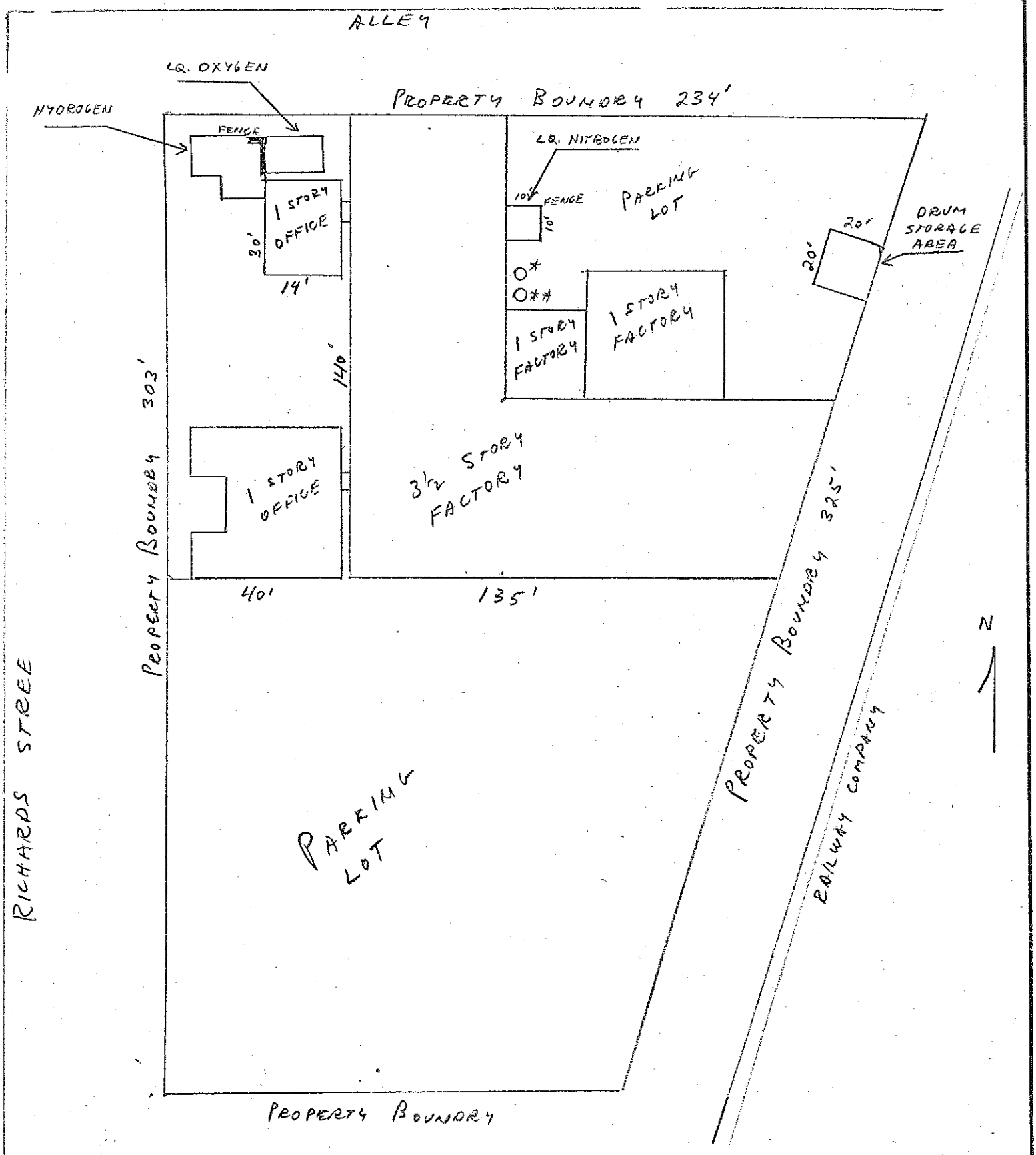
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-18-81

Form Approved OMB No. 158-S80004 784

V. FACILITY DRAWING *(see page 4)*



SCALE: 1 INCH = 40 FEET

* 260 GAL STORAGE TANK (NEW TRICHLOROETHYLENE)

** 300 GAL STORAGE TANK (USED " ")

ILD 005130430

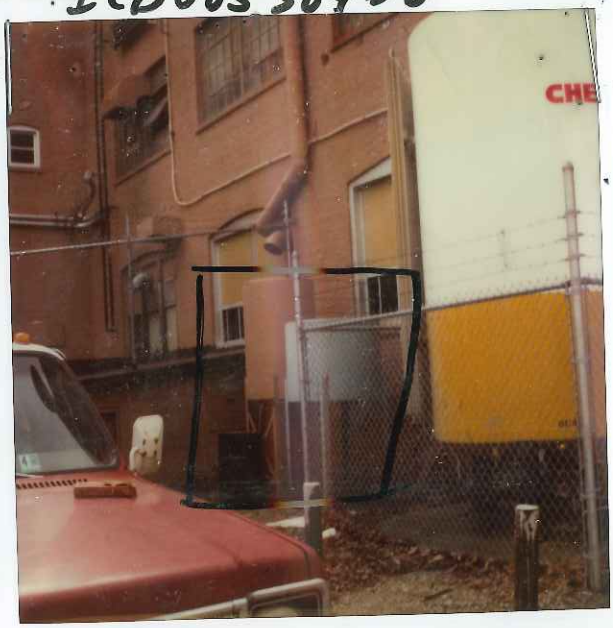
ILD005130430

TRICHLOROETHYLENE STORAGE TANKS 1 OF 3

ILD005130430

DRUM STORAGE AREA 2 OF 3

ILD005304304



TRICHLOROETHYLENE STORAGE TANKS 3 OF 3

A.4 Closure/
Post-Closure

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MARCH 20,1987

Re: Closure Plan Review
Facility Name: RICHARDSON ELECTRONICS,CETRON
USEPA ID #: [illegible]
0890350004

RICHARDSON ELECTRONICS
715 HAMILTON STREET
GENEVA,IL. 60134

Dear SIR,

As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call GENE DINGLEDINE at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CA:tk:5/2/9

Enclosures

cc: David A. Stringham, USEPA - Region V
Permit Section
Division File

IL 532-1428
LPC 217 11/85

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0890350004 -- Kane County
Geneva/Richardson Electronics
Closure Plan Approved: June 18, 1987 Log # C-311
ILD005130430
RCRA - Closure

July 14, 1988

Richardson Electronics
Attn: George W. Snyder
40 W 267 Keslinger Road
LaFox, IL 60147

Mr. Snyder:

This letter will acknowledge receipt of the closure certification dated March 9, 1988 and received by the Agency on March 14, 1988.

According to 35 Ill. Adm. Code, Section 725.215, certification of closure is to be provided in accordance with the specifications in the approved closure plan. The approved closure plan for this facility consists of the plan which was submitted by yourself dated February 26, 1986 and the conditions of the June 18, 1987 letter from Lawrence W. Eastep, P.E.

The Agency has determined that the closure of this container (S01) and tank (S02) storage units was not conducted in accordance with the approved closure plan and is hereby disapproved for the following reasons:

1. Manifest copies of final waste removal have not been provided.

2. A description of sampling and analytical methods have not been provided.

3. Photo documentation of closure has not been provided.

4. Soil samples have not been taken at the crack in the concrete floor of the drum storage area.

Closure certification for this facility will not be approved by the Agency until all requirements of the approved closure plan are met. Certification documents meeting these requirements must be received by the Agency within 30 days of receipt of this letter. The attached certification form must be used.

Should you have questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:bls/2043j,46,47

Attachment

cc: Northern Region
USEPA Region V, Mary Murphy
Division File
Andy Vollmer
Compliance Section,
Eugene W. Dingledine

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-311

The hazardous waste management S01 and S02 units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois Registration Number

Date

EWD:bls/2043j,48

P486652383

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0890350004 -- Kane County
Richardson Electronics, Ltd.
ILD005130430
RCRA - Permits

May 6, 1988

Richardson Electronics, Ltd.
715 Hamilton St.
Geneva, Illinois 60134

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-726. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Maywood Region
USEPA Region V

C.2 Compliance/ Enforcement

LPC 089 03 04

ILD005130430
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: CETRON ELECTRONIC CORP

(B) Street: 715 HAMILTON

(C) City: GENEVA (D) State: IL (E) Zip Code: 60134

(F) Phone: 312-232-4140 (G) County: KANE

(H) Operator: CETRON ELECTRONIC

(I) Street: 715 HAMILTON

(J) City: GENEVA (K) State: IL. (L) Zip Code: 60134

Phone: _____ (N) County: _____

(O) Owner: PUBLIC STOCK OWNERSHIP

(P) Street: SAME AS ABOVE

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Type of Ownership: ___ Federal ___ Municipal X Private ___ State ___ County

(W) Date of Inspection: 3-26-81 (Q) Time of Inspection (From) 10:50 (To) 11:40

(X) Weather Conditions: PARTLY CLOUDY ; ~55°

(1) Person(s) Interviewed	Title	Telephone
GEORGE SNYDER	PLANT Mgr.	

(2) Inspection Participants	Title	Telephone
LISA BINDER	EPS	217-782-6760

II. Description of Site Activity

(A) ____ Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) ____ Chemical, Physical and Biological Treatment (Form 4)

(D) _X_ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: NOTIFIED AS GENERATOR ALSO; BUT ACCORDING TO MR. SNYDER THEY ONLY GENERATE ~100 gal OF TRICHLOROETHYLENE PER MONTH (WGT = 11.0 lbs/gal)

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	X			

II' GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		
2. Transfer of Ownership?		X		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		X		THIS COMPANIES HAULER - BARON BLAKESLE WILL EITHER RUN THE ANALYS OR HAVE IT DONE FOR THEM. CETRO WILL RETAIN THE ~~REGAR~~ RECORDS WHEN COMPLETE
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?			X	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			X	
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	X			NIGHT WATCHMAN SERV
2. Artificial or Natural Barrier Around Facility?		X		WILL BE FENCED.
3. Controlled Entry?	X			WILL PUT DANGER SIGN ON.
4. Danger Sign(s) at Entrance?	X			AROUND ROOM WHERE DE-GREASER IS KEPT.
(D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?			X	THEY HAVE NO RECORDS BECAUSE THERE HAVEN'T BEEN ANY OF THESE
2. Records of Operator Error?			X	
3. Records of Discharges?			X	
4. Inspection Schedule?			X	
5. Safety, Emergency Equipment?	X			
6. Security Devices?	X			
7. Operating and Structural Devices?	X			
8. Inspection Log?	X			

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?			X	(1)
2. Description of Training?			X	ON THE JOB
3. Records of Training?			X	
Is Personnel Training Completed within the Required Time Frame?			X	
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?				NONE ON SITE
2. No Smoking Signs?				
3. Separation and Confinement?				

IV. PREPAREDNESS AND PREVENTION

	Yes	No	Not Inspected	See Remark Number
(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?	X			
(B) Does the Facility have the Following Equipment:				
1. Alarm System?	X			
2. Telephone or 2-Way Radios?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control;

Units: FIRE EXTINGUISHERS - A, B, C.; CO_2; HIGH PRESSURE H_2O; METAL QUIRED; SPRINKLER SYSTEM.; GAS MASKS

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	X			
2. Is Emergency Equipment Maintained in Operable Conditions?	X			
(D) Has Owner or Operator Provided Immediate Access to Internal Alarms (if needed)?	X			
(E) Is there Adequate Aisle Space for Unobstructed Movement?	X			
(F) Are Arrangements with Local Authorities Included in the Operating Record?	X			

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:				
1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)		X		HAVE IN REGARDS TO FIRE + EVACUA WILL AMEND FOR HAZ. WASTE.
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?		X		

W.L.

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			FOR FIRE EXTINGUISHER NOT FOR GAS MASKS WILL AMEND
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	X			
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?	X			

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	X		X	NONE EVER REQUIRED
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	X			
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	X			

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?		X		
2. Has this plan been submitted to the Regional Administrator?		X		
3. Has Closure begun?		X		
4. Is closure cost estimate available by May 19, 1981?		X		
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?		X		

REMARKS

① ONLY ONE PERSON HANDLES THE WASTE, THE STOCK HANDLER. THIS WASTE IS ~~FROM~~ WASTE IS PUMPED DIRECTLY FROM DE-GREASER INTO TANK. THE HANDLING OCCURS WHEN BARON BLAKESLEE (HAULER) COMES IN TO PICK UP THE WASTE. BLAKESLEE'S PERSONNEL AND THE STOCK HANDLER TRANSFER WASTE FROM TANK TO DRUMS.

LPC 0890350Y

ILD005130430
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: CETRON ELECTRONIC CORP.

(B) Street: 715 HAMILTON ST.

(C) City: GENEVA (D) State: IL (E) ZIP Code 60134

(F) Date of Inspection: 3-24-81

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?				
2. Are containers compatible with waste in them?				
3. Are containers stored closed?				
4. Are containers managed to prevent leaks?				
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?				
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X		X	~~CLOSED TANK~~

Continued on next page

		NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?	X			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?			X	ONLY USED FOR THE ONE WASTE
5. Are required daily and weekly inspections done?	X			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
C. Facilities which store hazardous waste in surface impoundments (Subpart K)				
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				
D. Facilities which store hazardous waste in waste piles (Subpart L)				
1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _ _ _ _ _ _ _
(11) (18)

_____ CO. - L.P.C. Region # _____ Date _ _/_ _/_ _
(20) (25)

_____/_____ Letter Sent (Yes or No) ___
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From _ _ : _ _ _ m Weather _____
Ground Water( ) Surface( ) Other( ) To _ _ : _ _ _ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ___ ___ ___
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)	_____ (30)			Board Order	( )
						Illegal (5)	( ) ___ (31)

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D ___ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

=> Not storage facil. if pm. quant. generator. See 261.5(f) in 11-15-80 regs. MB

DIAGRAM:

(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

GENERAL INFORMATION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Consolidated Permits Program

(Read the "General Instructions" before starting.)

GENERAL

I. EPA I.D. NUMBER: F ILD 0 0 5 1 3 0 4 3 0

LABEL ITEMS

I. EPA I.D. NUMBER: ILD005130430

III. FACILITY NAME: CETRON ELECTRONIC CORPORATION

V. FACILITY MAILING ADDRESS: 715 HAMILTON ST, GENEVA, IL 60134

VI. FACILITY LOCATION: 715 HAMILTON ST, GENEVA, IL 60134

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTA
A. Is this facility a **publicly owned treatment works** which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: CETRON ELECTRONIC CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 George Snyder PLANT ENG.	312 232 4140

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 715 Hamilton St.			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 Geneva, Ill.		60134	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 715 Hamilton St.			
B. COUNTY NAME			
Kane			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE** *(if known)*
6 GENEVA,	IL	60134	

EPA Form 3510-1 (6-80)

FEB 18 1981

CONTINUE ON REVERSE

NTINUED FROM THE FRONT

II. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3673 (specify) ELECTRONIC COMPONETS	C 7 (specify)
C. THIRD	**D. FOURTH**
(specify)	C 7 (specify)

III. OPERATOR INFORMATION

A. NAME: CETRON ELECTRONIC CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
0 (specify) Public Stock Corp.

D. PHONE (area code & no.): C A 312 584 1321

E. STREET OR P.O. BOX: 15 Hamilton street

F. CITY OR TOWN: Geneva

G. STATE: Il

H. ZIP CODE: 60134

IX. INDIAN LAND
Is the facility located on Indian lands? [ ] YES [X] NO

V. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) T N	D. PSD (Air Emissions from Proposed Sources) C T 9 P
B. UIC (Underground Injection of Fluids) T U	E. OTHER (specify) C T 9 (specify)
C. RCRA (Hazardous Wastes) T R	E. OTHER (specify) C T 9 (specify)

VI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

VII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF ELECTRON TUBES

VIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-17-81

COMMENTS FOR OFFICIAL USE ONLY

(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FOR 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A
F	I	L	D	0	0	5	1	3	0	4	3	0

1 2 — 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 — 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 71 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 71 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8	6 5	0 1	0 1
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 72 1. FACILITY HAS INTERIM STATUS

[ ] 72 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
posal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C	D	U	P											1

1 2 — 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 — 18	19 — 27	28	29 — 32		16 — 18	19 — 27	28	29 — 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 2	300	G		7				
2	S 0 1	1,000	G		8				
3					9				
4					10				

Continued from the front.

II. PROCESSES *(continued)*

E. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each **listed** waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY												
S											T/A	C		S									T/A	C		
W	I	L	D	0	0	5	1	3	0	4	3	0		1	W			D	U	P				2	D	U	P
1									13		14	15			1	2					13		14	15		23		26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
1	F 0 0 1	14,664	P		
2	U 0 0 2	1,650	P		
3	U 1 5 4	1,975	P		
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WAST (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S												T/A	C
F	I	L	D	0	0	5	1	3	0	4	3	0	6

1 2 – 13 14 15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
4	1	5	3	4	00	0	88	1	8	5	00
55	56	57	58	59	– 71	72	– 74	75	76	77	– 79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
C E –––––––– –––––––––– 15 16 – 55	56 – 58 59 – 61 62 – 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F –––––––– 15 16 – 45	C G ––––––––– 15 16 – 40	41 42	47 – 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-18-81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

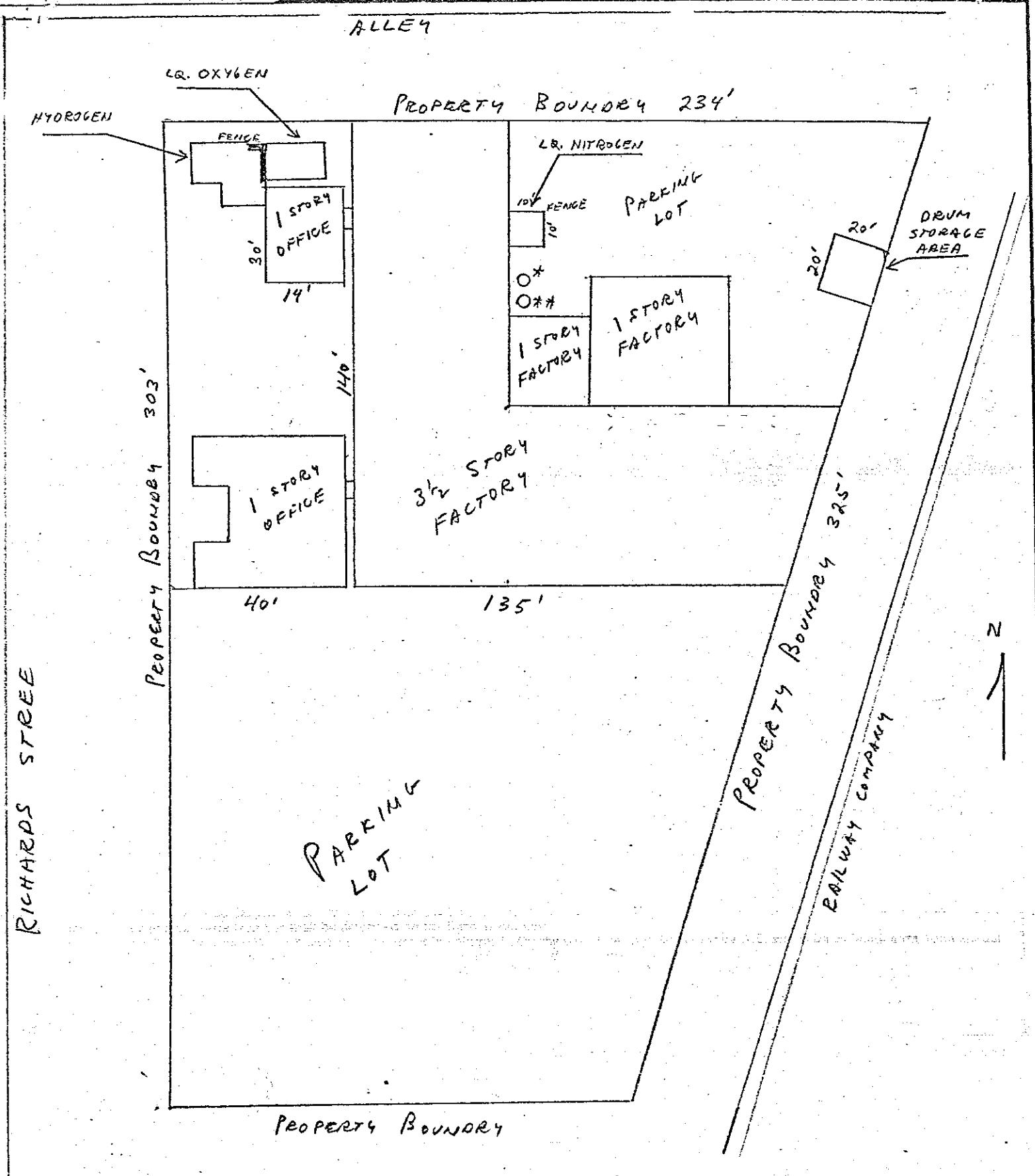
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Thomas R. Sweet Vice President	Thomas R Sweet	2-18-81

CONTINUE ON PAGE 5

Continued from page 4.

Form Approved OMB No. 158-S80004 / 07

V. FACILITY DRAWING *(see page 4)*



SCALE: 1 INCH = 40 FEET

* 260 GAL STORAGE TANK (NEW TRICHLOROETHYLENE)

** 300 GAL STORAGE TANK (USED " ")

AWS

ILO 00513043O

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Tony Dibling
Facilities Manager
Richardson Electronics, Ltd.
715 Hamilton Street
Geneva, Illinois 60134

Re: Visual Site Inspection
Cetron Electronics Corporation
Geneva, Illinois
ILD 005 130 430

Dear Mr. Dibling:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CETRON ELECTRONICS CORPORATION
GENEVA, ILLINOIS
ILD 005 130 430

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Cetron Electronics Corporation (Cetron) facility in Geneva, Kane County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. A completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Manufacturing of electron tubes and components began at the facility in 1965, under Cetron ownership. Richardson Electronics Ltd., the current owner, purchased the facility in 1982, and retained the Cetron name for trademark purposes. Facility operations remained essentially the same until 1986, when Richardson discontinued manufacturing processes at the facility. Since 1986, the facility has been used for the assembly, testing, and storage of electron tubes and components manufactured at the Richardson facility in LaFox, Illinois. The facility occupies 1.4 acres in a residential area and employs about 13 people. The Geneva Organ Company constructed the building and operated on site beginning in the early 1900s. No record of property transfer or pre-1965 on-site activity was found. During the VSI, the facility representative stated that low-volume spray painting of electrical components was the only manufacturing activity occurring at the facility since 1986. Since the VSI, this electrical component has been phased out of production and spray painting is no longer conducted at the facility.

The primary waste streams generated by the facility are waste cardboard and wood packing materials. Until the summer of 1992, spray painting operations were also conducted at the facility. All spray painting took place in a water wash paint booth. Facility personnel stated that waste paint was washed down the sanitary sewer with wastewater from the booth. However, it was evident during the VSI that some waste paint was skimmed from the wastewater and disposed of in a general refuse trash can. Facility representatives were unable to provide wastewater or waste paint characteristics other than that the paint was a solvent-based lacquer paint. Wastewater and waste paint were not managed as hazardous or special wastes.

Cetron submitted a Part A application in 1981, and the facility maintained its status as a hazardous waste treatment, storage, and disposal facility until 1990, when its Part A application

was formally withdrawn. Hazardous waste management units (SWMUs 1 and 2) were RCRA closed, and soil samples were collected from beneath these units. Contaminant levels from the sampling were background level or below IEPA action levels. The facility is currently regulated as a generator only and has not shipped RCRA-regulated wastes off site since 1986.

The PA/VSI identified the following four SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Former Waste Solvent Tank
2. Former Drum Storage Shed
3. Former Waste Paint Area
4. Former Boiler

Currently, all SWMUs have low or no potential for release to ground water, surface water, on-site soils, or air. SWMUs 1, 2, and 4 have been removed.

The former waste paint area (SWMU 3) is the only remaining SWMU. SWMU 3 managed waste paint from a water wash spray paint booth. Although the generation rate and hazardous constituents of the paint are unknown, potential for release is low because the unit is no longer used. Past potential for release from SWMU 3 to ground water, surface water, on-site soils, and air was low. The unit was located indoors on a concrete surface that drained to the sanitary sewer and the water curtain removed overspray that remained in the air.

The former boiler (SWMU 4), used to heat the facility, was also periodically used to incinerate small amounts of waste zirconium. Release potential to air was high because boiler exhaust was discharged to the air. However, the potential for harm to human health and the environment was low because of infrequent incineration of small quantities of zirconium.

BVWST recommends no further action for SWMUs 1, 2, and 4. BVWST recommends that the facility continue flushing the water wash paint spray booth until analyses determine that the unit is no longer contaminated. BVWST also recommends that if the facility reinstitutes paint spraying, the facility should characterize the waste paint and wastewater to determine whether they are hazardous wastes. If they are hazardous wastes, the facility should manage them in accordance with applicable regulations.

1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. As a team member with PRC under the TES 9 contract, B&V Waste Science and Technology Corp. (BVWST) conducted the PA/VSI for the Cetron Electronics Corporation (Cetron) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Cetron facility (ILD 005 130 430) in Geneva, Kane County, Illinois. The PA was completed on June 3, 1992. BVWST gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), EPA Region 5 RCRA files, and other sources, including the Federal Emergency Management Agency (FEMA), Illinois Department of Conservation (IDOC), Illinois State Water Survey (ISWS), U.S. Department

of Agriculture (USDA), and U.S. Geological Survey (USGS). The VSI was conducted on June 4, 1992. It included interviews with one facility representative and a walk-through inspection of the facility. BVWST identified four SWMUs at the facility.

BVWST completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Cetron facility is located at 715 Hamilton Street in Geneva, Kane County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41° 53' 40" N and longitude 88° 18' 50" W) (Cetron, 1981). The facility occupies 1.4 acres of land in a residential area.

The facility is bordered on the north by Burgess Norton Manufacturing Co. and on the south, east, and west by residential property.

2.2 FACILITY OPERATIONS

Since 1986, the Cetron facility has been used by its owner, Richardson Electronics Ltd., for the assembly, testing, and storage of electrical tubes and components. The facility, which occupies a four-story building of approximately 60,000 square feet on 1.4 acres of land, has 13 employees. The Geneva Organ Company constructed the building and operated on site beginning in the early 1900s. No record of property transfer or pre-1965 on-site activity was found. Tubes and components are delivered to the Cetron facility from the Richardson Electronics facility in LaFox, Illinois, where they are manufactured. During the VSI, the facility representative stated that with the exception of occasional spray painting, no manufacturing activities have occurred on site since 1986. Since the VSI, the facility has stopped all spray painting operations. The facility has one water wash spray booth which was not in use during the VSI. Waste paint residue was either washed down the sanitary sewer with the wastewater from the booth or skimmed from the surface of the water in the tank of the booth. Skimmed residue was placed in a trash can in the waste paint area (SWMU 3) along with general refuse and was disposed of in a nonhazardous dumpster. Parts that have been assembled and tested are packaged and stored on site.

Electrical tubes and components were manufactured at the Cetron facility from 1965 until 1986. The building has been in use since the early 1900s; however, there is no record of any

SOURCE: MODIFIED FROM USGS, 1980
GENEVA AND AURORA NORTH QUADRANGLES

CETRON ELECTRONICS
GENEVA, ILLINOIS
PA/VSI

FIGURE 1
FACILITY LOCATION

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on-site activities before 1965. The manufacture of electrical parts and components began in 1965 under Cetron ownership (Cetron, 1981). Richardson Electronics Ltd. purchased the facility in 1982 and retained the Cetron name for trademark purposes (Richardson, 1986a). Past operations included metal stamping, degreasing, silver plating of electron tubes, acid glass washing, zirconium coating of copper tubes, spray painting, and assembly. These operations generated the following waste streams: trichloroethylene (F001), acetone (U002, F003), and methyl alcohol (U154) used in degreasing; hydrofluoric acid rinsewater from glass washing; zirconium powder from zirconium spraying; and kepone (U142), whose use is unknown (Cetron, 1983; 1985; 1986). Raw materials used in the manufacturing process include copper tubes, steel, nickel, iron, aluminum, glass tubes, zirconium, and silver. Product chemicals include trichloroethylene, amyl acetate, hydrofluoric acid, methyl alcohol, and kepone. Trichloroethylene was delivered to a 260-gallon tank adjacent to the waste solvent tank (SWMU 1). All other product chemicals were delivered in drums and stored in the drum storage shed (SWMU 2).

Section 2.3 discusses the solid wastes generated from facility operations, and the SWMUs where they are or were managed.

2.3 WASTE GENERATION AND MANAGEMENT

By the end of 1986, hazardous waste generating processes were discontinued at the Cetron facility. Since that time, the facility has been used for the assembly, testing, and storage of products produced in the Richardson Electronics Ltd. facility in LaFox, Illinois.

The only process conducted from 1986 to 1992 at the facility that may have generated a hazardous waste was spray painting. One water wash paint booth was used to apply a solvent-based lacquer paint to some parts. The booth was not in use at the time of the VSI. Facility personnel believe that the waste paint was washed down the sanitary sewer with the wastewater from the booth. However, it was evident during the VSI that some waste paint was skimmed from the wastewater and deposited in a trash can in the waste paint area (SWMU 3). The trash can is used to accumulate general refuse and is emptied into a nonhazardous dumpster. Facility personnel indicated that the painting was a low-volume operation, and did not provide further detail requested regarding the quantity of waste paint and wastewater (PRC, 1993). It is unknown if the facility generated a regulated quantity of waste paint and wastewater, and whether the waste paint and wastewater exhibited hazardous characteristics. Because it was a solvent-based paint the waste paint probably exhibited the ignitability characteristic. Also, if

zirconium residue remained in the paint spray gun or the water wash paint booth contaminating the wastes, they may exhibit the ignitability characteristic due to zirconium's flammable character. Other wastes produced at the facility are wood and cardboard packing crates and general refuse from the facility, which are disposed of in a nonhazardous dumpster.

Between 1965 and 1986, the facility regularly generated several hazardous wastes. Trichloroethylene was used in a vapor degreaser to remove machining oils from stamped metal parts. Between 300 and 1200 gallons of waste trichloroethylene (F001) were generated per year. This waste was periodically pumped from the degreaser to the former waste solvent tank (SWMU 1), where it remained until it was pumped out and hauled off site by Barron Blakeslee of Cicero, Illinois. It is unclear how often the waste was removed, but it did remain in the tank for periods greater than 90 days (Cetron, 1983; 1985).

Other hazardous wastes were stored in drums in the former drum storage shed (SWMU 2) for greater than 90 days before being picked up by Hydrite Chemical of Cottage Grove, Wisconsin. Waste acetone (U002, F003) from degreasing was generated at a rate of about 100 gallons per year (Cetron, 1986). Methyl alcohol (U154), also used in degreasing, was generated at a rate of 400 gallons per year. Kepone (U142), whose use is unknown, was generated at a rate of about 50 gallons per year (Cetron, 1983). Off-spec amyl acetate (D001) was generated at a rate of about 55 gallons per year (Cetron, 1986). An unknown quantity of waste hydrofluoric acid rinse water from the washing of glass parts was neutralized before it was discharged to the sanitary sewer. Further information regarding the rinsewater treatment method and location was unavailable.

Before 1985, the water wash spray paint booth was used to spray zirconium onto internal tube parts. Facility personnel stated that this generated about one pound of waste zirconium powder every three months. Wastewater from the water wash spray paint booth was centrifuged to separate the zirconium from the water. About once every three months, waste zirconium was incinerated in the former boiler (SWMU 4). The former boiler (SWMU 4) was primarily used to heat the facility. No record of any permit for this activity was found. Although the booth has not been used for zirconium spraying since 1985, it is flushed with water every 10 minutes, because of the potential fire hazard posed by zirconium. The former boiler (SWMU 4) was removed sometime after 1985 and was replaced by a more efficient system. No incineration of wastes has occurred on site since SWMU 4 was removed.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

There are no documented releases from the Cetron facility.

2.5 REGULATORY HISTORY

Cetron submitted a Notification of Hazardous Waste Activity form to EPA on August 11, 1980. "Generation" and "treat/store/dispose" were marked as types of hazardous waste activity. F001 and F007 were listed as hazardous wastes from non-specific sources. U002, U019, U151, U154, P104, U220, and U228 were listed as commercial chemical product hazardous wastes. "Corrosive" was marked, corresponding to the characteristics of non-listed hazardous wastes. No further information was included in this form (Cetron, 1980).

Cetron submitted a RCRA Part A application on February 7, 1981 (Cetron, 1981). Process code S02 (tank storage) was listed with a process design capacity of 300 gallons and referred to the former waste solvent tank (SWMU 1). S01 (container storage) was listed with a process design capacity of 1,000 gallons, which referred to the former drum storage shed (SWMU 2). In the description of hazardous wastes section, the following waste numbers, quantities, and process codes were listed:

- F001; 14,664 lbs.; S02.
- U002; 1,650 lbs.; S01.
- U154; 1,975 lbs.; S01.

Cetron submitted a Part A Withdrawal Request form and a closure certification statement in March 1988, after SWMUs 1 and 2 were closed in accordance with an IEPA-approved closure plan (Richardson, 1988; IEPA, 1988). The waste solvent tank (SWMU 1), the drum storage shed (SWMU 2), and their concrete slabs were removed in 1986 (Richardson, 1986c). After the removals, soil samples were collected and analyzed for trichloroethylene. Contaminant levels from the sampling were background level or below IEPA action levels (Enviro-Test, 1988). IEPA did not grant final approval to the Part A withdrawal and closure activities until May 1990 because of

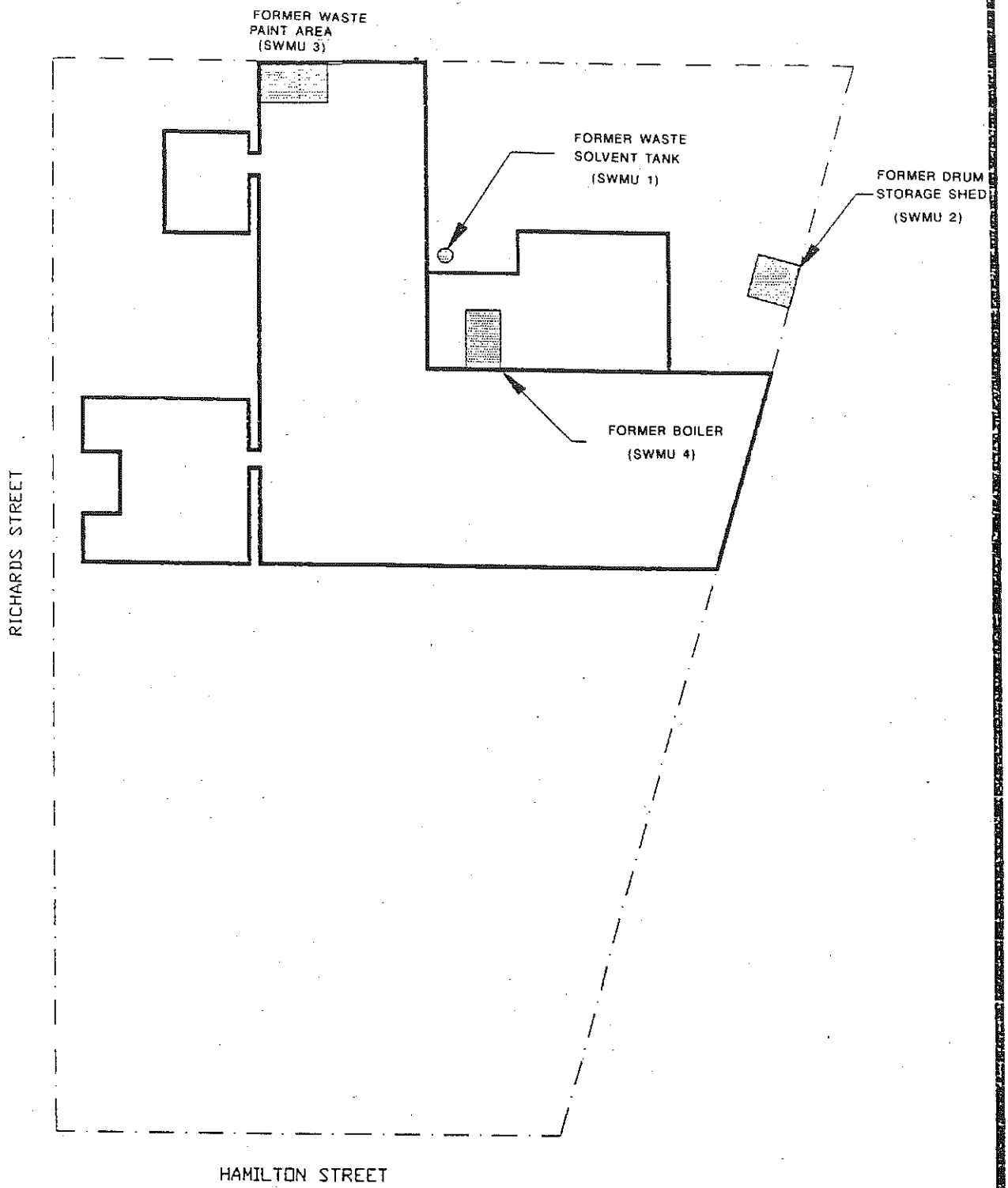
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Former Waste Solvent Tank	Yes	RCRA Closed
2	Former Drum Storage Shed	Yes	RCRA Closed
3	Former Waste Paint Area	No	Inactive
4	Former Boiler	No	Inactive, Removed

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



N

Not to Scale

SOURCE: MODIFIED FROM CETRON ELECTRONICS, 1981

CETRON ELECTRONICS
GENEVA, ILLINOIS
PA/VSI

FIGURE 2
FACILITY LAYOUT

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TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a, b]	Source[b]	Solid Waste Management Unit[b]
Trichloroethylene (F001)	Degreasing	SWMU 2
Acetone (U002, F003)	Degreasing	SWMU 2
Methyl Alcohol (U154)	Degreasing	SWMU 2
Kepone (U142)	Unknown	SWMU 2
Amyl Acetate (D001)	Off-spec product	SWMU 2
Hydrofluoric acid wastewater/ Unknown	Glass cleaning	Unknown
Waste paint/Unknown	Spray painting	SWMU 3, nonhazardous dumpster
Wastewater/Unknown	Spray painting	SWMU 3
Packing materials/NA	Shipping/receiving	Nonhazardous dumpster
Zirconium powder/Unknown	Coating glass tubes	SWMU 3, 4

Notes:

a Nonapplicable (NA) designates nonhazardous waste.

b "Unknown" indicates that the waste was generated at the facility, but waste type, source, or SWMU that managed the waste cannot be determined.

a lack of information regarding final disposition of materials removed from the site during closure (IEPA, 1990). The facility is currently regulated as a generator and has not shipped RCRA-regulated wastes off site since 1986 (Richardson, 1986b).

Cetron has been cited for minor RCRA violations. The facility was cited by IEPA for failure to submit a Generator Annual Hazardous Waste Report and for deficiencies regarding submittal of a closure plan, financial assurance for closure, and liability assurance (IEPA, 1981; 1984; 1985; 1986). Records indicate that these violations have been corrected, and there is no record of any outstanding violations (Richardson, 1985; IEPA, 1990).

The facility is not required to have air operating permits and has no history of odor complaints from area residents. No record of any National Pollution Discharge Elimination System (NPDES) or sanitary sewer permits was found. The facility has no underground tanks, and no record of any past underground tanks was found.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water near the Cetron facility.

2.6.1 Climate

The climate in Kane County is continental. The average monthly temperature is 48.9 degrees Fahrenheit (°F). The lowest average daily temperature is 16 °F in January. The highest average daily temperature is 83 °F in July. The total annual precipitation for the county is 34.7 inches. The 1-year, 24-hour maximum rainfall is about 10 inches. The prevailing wind is from the west. Average wind speed is highest in March, at 12 miles per hour (USDA, 1979).

2.6.2 Flood Plain and Surface Water

The facility is not located in the 500-year floodplain (FEMA, 1981). The nearest surface water body, the Fox River, is located about one-half mile east of the facility and is used for recreation and the municipal water supply (Geneva, 1992a). The Fox River drains to the Illinois River, about 50 miles southwest of the facility.

Storm runoff from the facility drains to the storm sewers on the streets bordering the property, which ultimately discharge to the Fox River (Geneva, 1992b). Wastewater from the facility drains to the Geneva sanitary sewer system.

2.6.3 Geology and Soils

The Cetron site is located on Markham silt loam (USDA, 1979). The Markham has a moderate to low permeability and is developed in calcareous, silty clay loam till deposited as an end moraine.

Geology at the site is expected to be comprised of an unknown thickness of glacial deposits (lake-deposited clay, till, outwash) over Paleozoic sedimentary rock units. No site-specific information on the stratigraphy is available. However, a detailed statewide study by Berg and Kempton (1988) provides regional three-dimensional mapping of geologic materials to a depth of 50 feet. Their map suggests that the Cetron vicinity is underlain by at least 50 feet of silty and clayey till. Berg and others (1984) rank aquifers in this vicinity with a low susceptibility to surface contamination because of fairly uniform till depth of at least 20 feet, with no evidence of interbedded sand.

Bedrock in the area is expected to be Silurian or Ordovician dolomite. The depth to bedrock, based on the mapping of Berg and Kempton (1988), is at least 50 feet.

2.6.4 Ground Water

In northeastern Illinois, ground water for public and industrial use is or has been obtained from four different water-producing zones. The first zone is the ground water occurring within unconsolidated Pleistocene sediments. The second zone is an interval of shallow bedrock units, which are generally in contact with the Pleistocene sediments. The third and fourth zones are two deeper intervals of water-producing rock units. Hughes and others (1966) discuss the character of each of the four zones, their hydrologic properties, and the location of their recharge zones. Virtually all wells producing municipal or industrial water within the Greater Chicago area, which includes the vicinity of the site, pump from one or both of the deep bedrock aquifer zones (Bergstrom et al., 1955). Well logs in the vicinity of the site show static ground water levels to be about 15 to 20 feet deep (ISWS, 1992).

The shallow bedrock zone in northeastern Illinois underlies the glacial sediments and is mainly comprised of Silurian dolomite. The upper boundary of this zone is the erosional surface of the bedrock, which is commonly obscured by glacial sediments, and the lower boundary is the Upper Ordovician Maquoketa Shale. Water produced from the dolomite is obtained from fractures and solution openings (Hughes et al., 1966). The shallow bedrock aquifer zone receives some recharge locally from precipitation (Hughes et al., 1966).

The deep bedrock aquifer zones include the Cambrian-Ordovician aquifer and the Mt. Simon aquifer (Hughes et al., 1966). The Cambrian-Ordovician aquifer contains two major zones: the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian-Ordovician zone is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely used where water requirements are less than 200 gallons per minute (gpm). This unit has a hydraulic conductivity between 9 and 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq.ft. Recharge to the deep bedrock aquifers is mostly from west and north of the six-county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system.

The Mt. Simon aquifer is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement rock. The average hydraulic conductivity of this aquifer is 16 gpd/sq.ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in south-central Wisconsin (Willman, 1971).

2.7 RECEPTORS

The facility occupies 1.4 acres in a residential area in Geneva, Illinois. Geneva has a population of about 13,000.

The facility is bordered on the north by Burgess Norton Manufacturing Co. and on the south, east, and west by residential areas. The nearest school is about one-quarter mile west of the facility. The property boundary of the facility is unfenced. The building is locked during non-operating hours and has a 24-hour security system.

The nearest surface water body is the Fox River, which is located about one-half mile east of the facility. The Fox River, which is used for recreation and for municipal water supply, receives effluent from the Geneva storm sewer. The nearest municipal water intake is about six miles downstream of Geneva, in Aurora.

Within a 3-mile radius of the facility, ground water is used for industrial and agricultural purposes and for municipal water supply. A small number of private residential wells are located within this area; however, residences within the Geneva limits are supplied by the Geneva municipal wells. Geneva has five active municipal wells; three are located about one mile east, west, and southeast of the facility. The nearest industrial well is less than 500 feet north of the facility, at the Burgess Norton Manufacturing Co. facility (ISWS, 1992).

Until the late 1980s, Geneva's municipal water supply has been provided by several deep wells drawing from a depth of about 2300 feet. Water from these wells was found to contain an excess of naturally occurring radium. As a result, Geneva began to phase out use of the deep wells, gradually replacing them with shallow wells. To date, two deep wells have been abandoned, and two shallow wells approximately 150 feet deep have been installed. The newly installed wells are located between one and two miles west of the facility. Geneva plans to rely on shallow wells as the exclusive source of municipal water supply (Geneva, 1992a).

Sensitive environments are not located on site. Sensitive environments within a two mile radius of the facility are discussed below.

Wetlands varying in type and size are located within this area. Numerous wetlands border the Fox River, which flows about one-half mile east of the facility. About 30 total wetlands, mainly of the Palustrine and Lacustrine systems, are well-dispersed throughout the area (USDI, 1984). No threatened or endangered species are located in this area (IDOC, 1992).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations.

SWMU 1	**Former Waste Solvent Tank**
Unit Description:	The unit was a 300-gallon steel above-ground tank located outdoors on a concrete slab near the north wall of the facility. The unit, including its concrete slab, was removed on July 25, 1986, after removal of all waste trichloroethylene (F001) from the tank (photograph 1).
Date of Startup:	The startup date is estimated to be sometime in 1965, when operations began at the facility.
Date of Closure:	The tank was removed from the facility in July 1986, according to an IEPA-approved closure plan.
Wastes Managed:	The unit managed waste trichloroethylene (F001) used in degreasing metal parts. When full, the tank contents would be pumped into drums by an approved waste hauler and removed from the site for recycling. Waste was stored in this unit for greater than 90 days.
Release Controls:	The unit had no release controls, other than the concrete slab.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The former location of the unit appeared clean; no evidence of release was noted. No drains were observed within or near the unit.

SWMU 2	**Former Drum Storage Shed**
Unit Description:	The unit was a metal shed, approximately 20 ft. by 20 ft. in area, on a concrete slab of about the same dimensions. The unit was outdoors, approximately 40 feet from the northeast corner of the building (photograph 2).
Date of Startup:	The unit began operations sometime after 1965, when facility operations began.
Date of Closure:	The unit, including its concrete slab, was demolished and removed from the site on August 15, 1986, according to an IEPA-approved closure plan.
Wastes Managed:	The unit managed drums of acetone (F003, U002), methyl alcohol (U154), kepone (U142), and amyl acetate (D001). Wastes were stored in this unit for greater than 90 days and were picked up for disposal by an approved hazardous waste hauler.
Release Controls:	The unit was an enclosed metal shed with a concrete slab.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The former location of the unit appeared clean, and no evidence of release was observed. No floor drains were observed within or near the unit.
SWMU 3	**Former Waste Paint Area**
Unit Description:	The unit is indoors, on the ground floor of the facility on the concrete floor. The unit consists of a rectangular steel tank attached to the water wash spray paint booth and a small metal trash can which is approximately 30 gallons in size (photograph 3). The rectangular tank has a capacity of approximately 300 gallons.

Before 1985, the unit included a centrifuge that was used to recover zirconium powder from the water in the tank. The base of the tank is connected to the sanitary sewer.

Date of Startup:

The unit began operations sometime after 1965, when facility operations began.

Date of Closure:

The unit is inactive.

Wastes managed:

The unit managed waste paint from the spray paint booth, as well as general refuse from the facility. Wastewater containing waste paint drained from the steel tank to the sanitary sewer. Some waste paint was skimmed from the water in the steel tank and was placed in the steel trash can with general refuse from the facility. Waste paint and refuse from the trash can were disposed of in a general refuse dumpster. It is unknown whether the waste paint was hazardous, however, the product paint was solvent based. The unit also formerly managed waste zirconium powder, which was ultimately incinerated in the former boiler (SWMU 4).

Release Controls:

The unit used a water-based overspray collection system to control releases. Overspray was washed away by a rear wall-mounted water curtain. Waste paint laden water was temporarily held in a collection tank attached to the paint booth. Floating waste paint residue was skimmed from the water in the collection tank, before the water was reused or drained into the sanitary sewer.

Although the booth has not been used for zirconium spraying since 1985 or solvent-based paint spraying since 1992, it is flushed with water every 10 minutes in order to minimize the fire hazard posed by residual zirconium.

History of Documented Releases:

No releases from this unit have been documented.

Observations:	During the VSI, a thin film of waste paint was present on the refuse in the trash can. Facility personnel believed this to be from the spray paint booth. The concrete floor was worn, with some cracking. No evidence of release was observed. The sanitary sewer that the unit discharges to is located at the rear of the unit. The water wash spray paint booth was not in operation, but did briefly flush with water. On February 2, 1993, the facility representative indicated that the lacquer paint spraying had ceased because the product line was phased out during the summer of 1992 (PRC, 1993).
SWMU 4	**Former Boiler**
Unit Description:	The unit was a boiler that heated the facility and was located on the concrete ground floor of the facility (photograph 4).
Date of Startup:	The date the unit began operations is unknown, but it may have been in use since the early 1900s.
Date of Closure:	The unit was estimated to have been removed in 1986.
Wastes managed:	The unit formerly managed waste zirconium powder recovered from the water wash spray paint booth.
Release Controls:	The unit was located indoors, but had no other release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The former location of the unit displayed no evidence of release. The concrete floor was in good condition. No floor drains were observed within or near the unit.

4.0 AREAS OF CONCERN

BVWST did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs at the Cetron facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are BVWST's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the Cetron facility and recommended further actions.

SWMU 1 **Former Waste Solvent Tank**

Conclusions: The unit has been removed, and IEPA has inspected and approved the closure. The unit has no potential for release to ground water, surface water, air, or on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 2 **Former Drum Storage Shed**

Conclusions: The unit has been removed, and IEPA has inspected and approved the closure. The unit has no potential for release to ground water, surface water, air, or on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 3 **Former Waste Paint Area**

Conclusions: The unit managed waste lacquer paint generated by the water wash spray paint booth. Further information regarding characterization and generation rate of the waste is necessary to determine the threat posed by this waste stream. Facility personnel stated that the waste paint was disposed of in the sanitary sewer with the wastewater from the water wash spray paint

booth, but some paint solids were being disposed of in a general refuse trash can during the VSI.

The current and past potentials for release from this unit to ground water, surface water, on-site soils, and air are low. The unit is located indoors on a concrete floor. Although the floor showed evidence of wear including cracks no evidence of a release was observed. Other than being flushed for the zirconium safety hazard at 10-minute intervals, the booth is no longer in use.

Recommendations: BVWST recommends the facility continue flushing the water wash paint spray booth until analyses determine that the unit is no longer contaminated. BVWST also recommends that if the facility reinstitutes paint spraying the facility should characterize the waste paint and wastewater to determine whether they are hazardous wastes. If they are hazardous the facility should determine generation rates of the wastes and manage them in accordance with application regulations.

SWMU 4 **Former Boiler**

Conclusions: The unit has been removed. It formerly managed a small quantity of waste. Currently, the unit has no potential for release to any environmental media. In the past, the unit had low potential for release to ground water, surface water, or on-site soils because it was located indoors on the concrete floor of the facility. The past potential for release to air was high because boiler exhaust was discharged to the air. About 1 pound of zirconium waste was incinerated once every 3 months.

Recommendations: BVWST recommends no further action for this SWMU.

TABLE 3

SWMU SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Former Waste Solvent Tank	1965 to 1986	None	None
2.	Former Drum Storage Shed	1965 to 1986	None	None
3.	Former Waste Paint Area	1965 to present	None	Continue to flush the booth until analyses show that the unit is nonhazardous. If the facility reinstitutes the use of the booth the wastes should be characterized and quantified.
4.	Former Boiler	Pre-1986	None	None

REFERENCES

Berg, R.C. and Kempton, J.P., 1988. "Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of 15 Meters," Illinois State Geological Survey, Circular 542.

Berg, R.C., et al., 1984. "Potential for Contamination of Shallow Aquifers in Illinois," Illinois State Geological Survey, Circular 532.

Bergstrom, R.E., et al., 1955. "Groundwater Possibilities in Northeastern Illinois," Illinois State Geological Survey, Circular 198.

Cetron Electronics Corporation (Cetron), 1980. Notification of Hazardous Waste Activity Form, August 11.

Cetron, 1981. RCRA Part A application, February 17.

Cetron, 1983, 1985, 1986. Generator Annual Hazardous Waste Reports submitted 2/26/83, 4/25/85, and 3/13/86.

Enviro-Test/Perry Laboratories, Inc. (Enviro-Test), 1988. Results of soil samples tested for trichloroethylene. May 25.

Federal Emergency Management Agency (FEMA), 1981. Flood Insurance Rate Map for Geneva, Illinois. August 3.

City of Geneva (Geneva), 1992a. Phone call to Tom Talsma, Director, Department of Public Works, from Matt Mastronardi, BVWST.

Geneva, 1992b. Phone call to John Donahue, Water and Sewer Superintendent, by Matt Mastronardi, BVWST.

Hughes, G.E., et al., 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, Circular 406.

Illinois Department of Conservation (IDOC), 1992. Endangered Species Consultation, Agency Action Report. Evaluation approved by Deanna Glosser, Ph.D., Endangered & Threatened Species Program Manager.

Illinois Environmental Protection Agency (IEPA), 1981. Report of RCRA inspection conducted by Lisa Binder. March 26.

IEPA, 1984. Letter from G.T. Zak, Manager, Compliance Assurance Unit, Compliance Monitoring Section, Division of Land Pollution Control to Cetron. April 17.

IEPA, 1985. Letter from Mark A. Haney, Facility Compliance Unit, Compliance Monitoring Section, Division of Land Pollution Control to George Snyder, Vice President of Facilities, Cetron. August 2.

IEPA, 1986. Letter from Michael F. Nechvatal, Manager, Compliance Monitoring Section, Division of Land Pollution Control to George Snyder, Cetron. January 10.

IEPA, 1988. Report of RCRA inspection conducted by Todd Marvel. April 6.

IEPA, 1990. Letter from Angela Aye Tin, Manager, Technical Compliance Unit, Compliance Section, Division of Land Pollution Control to Richardson Electronics Ltd. May 4.

Illinois State Water Survey (ISWS), 1992. Private well and Public-Industrial-Commercial well databases.

PRC Environmental Management, Inc. (PRC), 1993. Log of Telephone Conversation from Celeste Brancel to Tom Dibling, Richardson, February 2.

Richardson Electronics Ltd. (Richardson), 1985. Letter from LaMonte Walker, Support Services Manager to G.T. Zak, IEPA. April 25.

Richardson, 1986a. Letter from LaMonte Walker, Support Services Manager, to US EPA Region 5. February 6.

Richardson, 1986b. Letter from George Snyder, to Michael F. Nechvatal, IEPA. February 7.

Richardson, 1986c. Closure plan submitted to Larry Eastep, IEPA. February 27.

Richardson, 1988. Closure certification statement signed by L.K. Walter, Jr., P.E., State of Illinois; Facility Part A Withdrawal Request Form. July 29.

U.S. Department of Agriculture (USDA), 1979. "Soil Survey of Kent County," 1979.

U.S. Department of the Interior, Fish and Wildlife Service (USDI), 1984. National Wetlands Inventory maps for Geneva and Aurora North 7.5 minute quadrangles.

U.S. Geological Survey (USGS), 1980. Topographic maps for Geneva and Aurora North 7.5 minute quadrangles.

Willman, H.B., 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey, Circular 460.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	IL D005130430

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Cetron Electronics Corporation	715 Hamilton Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Geneva	IL	60134	Kane		
09 COORDINATES: LATITUDE 41°53'40"	**LONGITUDE** 88°18'50"				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
Facility is located two streets north of the intersection of Roosevelt Road and Richards Street.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Richardson Electronics, Ltd.	40W267 Keslinger Road		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
LaFox	IL	60147	708/208-2285
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Same			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☒ A. RCRA 3010 DATE RECEIVED: 08/11/80 *(MONTH DAY YEAR)* ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ *(MONTH DAY YEAR)* ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES ☐ NO DATE June 4, 1992
BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*
CONTRACTOR NAME(S): B&V Waste Science and Technology Corp. (BVWST)

02 SITE STATUS *(Check one)*
☒ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1965 | present *(BEGINNING YEAR ENDING YEAR)* ☐UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Zirconium residue

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
None.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*
☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*		03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA		(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Matt Mastronardi		BVWST	(312)346-3775	07 24 92 *(MONTH DAY YEAR)*

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

CETRON ELECTRONICS CORPORATION
GENEVA, ILLINOIS
ILD 005 130 430

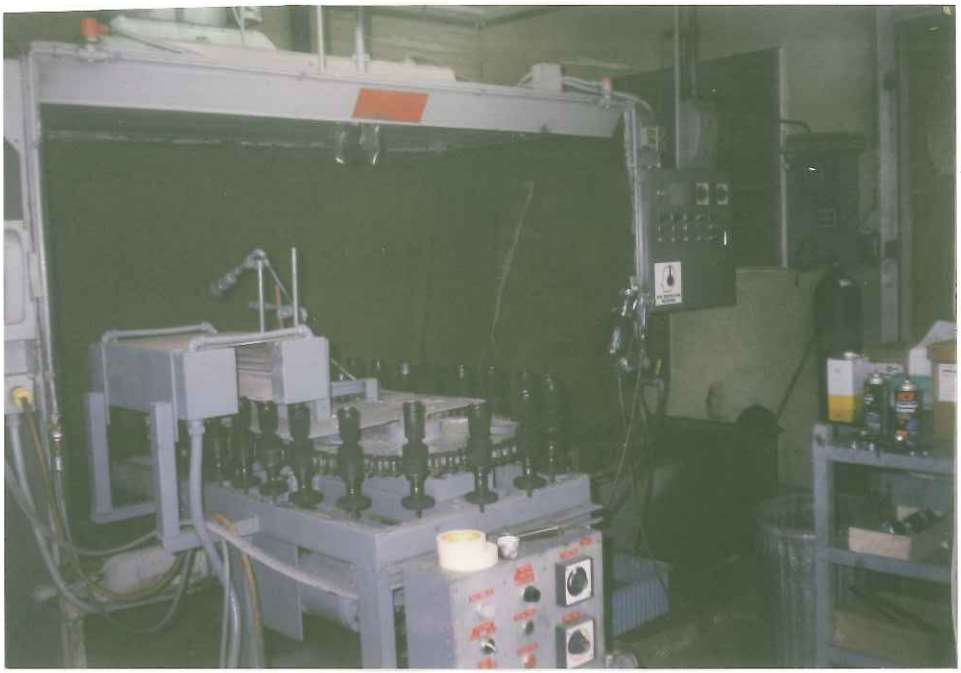
Date:	June 4, 1992
Facility Representative:	Tony Dibling, Facilities Manager Richardson Electronics, Ltd.
Inspection Team:	John Chitwood, B&V Waste Science and Technology Corp. (BVWST) Matt Mastronardi, BVWST
Photographer:	Matt Mastronardi
Weather Conditions:	Overcast, temperature about 75°F, calm
Summary of Activities:	The VSI began at 9:30 a.m. on Thursday, June 4, 1992, in the lunchroom on the fourth floor of the facility. BVWST representatives briefly described the VSI and answered questions from Tony Dibling regarding the purpose of the RCRA Facility Assessment. Mr. Dibling then responded to BVWST questions concerning SWMUs, past and present facility operations, surrounding land use, waste generating, and regulatory history. The VSI tour of the facility began at 10:35 a.m., on the fourth floor of the facility. Accompanied by Mr. Dibling, the inspection team viewed storage areas on the upper floors of the facility and proceeded downstairs. The water wash spray paint booth and waste paint area (SWMU 3) on the ground floor were inspected and photographed. Next, the former boiler (SWMU 4) location was inspected and photographed. The inspection team proceeded outdoors to inspect and photograph the former locations of the waste solvent tank (SWMU 1) and the drum storage shed (SWMU 2). The inspection team viewed surrounding land use and discussed site security with Mr. Dibling. The inspection team and Mr. Dibling returned to the lunchroom at 11:30 a.m. Mr. Dibling agreed to attempt to locate further information concerning waste generation and facility operations while BVWST went off site for lunch. BVWST went off site for lunch at 11:50 a.m., and arrived at the Richardson Electronics Facility in LaFox at 1:10 p.m., to pick up further information from Mr. Dibling. BVWST left the Richardson facility at 2:10 p.m., after a brief exit meeting.

Photograph No. 1
Orientation: Southwest
Description: Inside fence, former location of 300-gallon waste solvent tank.

Location: SWMU 1
Date: June 4, 1992

Photograph No. 2
Orientation: Northeast
Description: Grassy area within hedge is the former location of the drum storage shed.

Location: SWMU 2
Date: June 4, 1992



Photograph No. 3 Location: SWMU 3
Orientation: NA Date: June 4, 1992
Description: Water wash spray paint booth in waste paint area. Small metal trash can is at right.

Photograph No. 4 Location: SWMU 4
Orientation: NA Date: June 4, 1992
Description: Former location of the boiler used to heat the facility.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

THURSDAY, 6/4/92

0930 | INTRO MTG. W/ TONY DIBLING, FACILITIES MGR., JOHN CHITWOOD, M.A.M. BEGINS. TONY HAS A PACKET OF RECORDS FROM THE VAULT, WHICH HE IS CHECKING FOR THE CLOSURE-PLAN. HE FINDS CLOSURE PLAN.

0940 | DOESN'T KNOW WHEN CETRON STARTED, ORIG. GENEVA ORGAN.
→ CONTINENTAL ELECTRIC, MADE CLOCKS → CETRON (SAME OWNER) → RICHARDSON ELEC. ('81 OR '82)

0945 | FACIL. IS PRIM. WAREHOUSE. RICHARDSON PRIMARILY DISTRIBUTES ELECTRONIC PRODUCTS. ANCHOR SCRS TO EQUIPMENT (SEMI-COND. RECTIFIER) AFFIXING THEM TO A HEAT SINK. PRODUCES ONLY CARDBOARD & WOOD CRATE WASTES. HEAT SINKS ARE MACHINED IN LAFOX PLANT.

PRIMARY SWMUs I.D.'D
- DRUM STORAGE
- 1,1,1, TRICHLOR.

TONY DOESN'T KNOW WHEN IT BECAME ACTIVE. TANKS, ETC. WERE HERE

AIM 6/4/92 (1)

THU. 6-4-92, CONT'D

WHEN WE GOT HERE (~1/6)

~~BURGESS~~ NORTON MFG. HM 6/4/92

SURROUNDING LAND USE

- BURGESS NORTON MFG. (NORTH) RESIDENTIAL ON OTHER SIDES.
- SIZE OF PROP. UNKNOWN

HOUSE ON PROPERTY, OWNED BY RICHARDSON. LAND EXTENDS BEYOND HOUSE, TO PROPERTY.

TOTAL EMPLOYEES: ~ 400 TOTAL (LA FOX + GENEVA.)

NO RCRA STATUS, SAYS TONY.

GENEVA HAS STORM SEWER & SANITARY SEWER. PLANT HAS SANITARY DRAINS. ONE MANHOLE ON PARKING LOT.

FAC. OPER.:

- ELECTRICAL TESTING: TESTS TUBES; NO WASTES.
- PACKAGING,
- ONE SPRAY BOOTH.
- SCR OPERATIONS

(2)

HH 6/4/92

THU. 6-4-92, CONT'D

SPRAY BOOTH USED TO BE A ZIRCONIUM METAL SPRAYER. COULD BE FLAMMABLE. BACK IN '85 ZIRC. OPER. ENDED. ZIRC. SPRAYED ONTO INTERNAL TUBE PARTS. LAST MANUFACTURING IN '86. ON-SITE ZIRC. INCINERATOR, IN BOILER, IT WAS A POWDER RECOVERED FROM SPRAYING. IT WAS HEATING BOILER. TONY NOT AWARE OF ANY PERMIT TO INCINERATE.

PAST OPERATIONS:

RAW MATL'S = METALS (Cu, Ni, Steel, Iron, Al, GLASS TUBES, silver bus

→ Metal stamping → parts were degreased & put into tubes. 1,1,1 trichloroethylene was part of degreaser.

SILVER PLATING: Photo tubes were Cu w/ silver plating in PVC tank. Silver dust reclaimed when dried.

LIQUID N to help create vacuum. ~~stopped~~ stopped in '85 or '86, when manuf. started.

TONY will find out when CETRON came out of Continental Electric.

HH 6/4/92

(3)

THU. 6-4-92, CONT'D

Drum storage area: solvents etc. dispensed into cans → went into process. Stored both product and waste. Some recycled, some disposed of. Tony has manifests. Barron / Blakesly → recycling. Tony will make a copy of the manifest for each waste.

OTHER PROCESSES

- Glass to glass seals → scraps → dumpster.

Acid wash of glass HFl acid, probably neutralized + washed down sanitary sewer. Waste gen. processes started when Cetron took over.

Reg. history: no air permit, no known complaints. Small grade school nearby.

Geneva has a Radium problem w/ municipal wells.

Bldg.: 4 floors. ≈ 60,000 sq. ft.

MM 6/4/92

(4)

THU. 6-4-92, CONT'D

10:35 VSI items 4th fl. : storage in boxes and crates. Silver plating area is still here.

PHOTO 1 Former silver plating area. Drain in floor. Facing W. Eyewash & emerg. shower. Epoxy floor, sloped to drain. 25' × 20'

Down to 3rd Fl. More storage, in crates, & cardboard boxes.

12' by 15' acid wash for glass. Drain went to sanitary.

Photo 2 Former glass wash area

Floor drain from silver plating area to drum, is Photo 3

Down to 2nd Fl. ~~Equipment~~
- more electronics & testing equip.

Photo 4 Water wash paint booth on ground floor, drain slightly

MM 6/4/92

(5)

THO. 6.4.92, CONT'D

Photo 5 Water-wash booth, agedn. - stacks

Acetone, trichloro, methanol used in degreaser, line ran to waste tank to remove waste

Photo 6 Vapor degreaser.

Photo 7 Former boiler area where metal was incinerated, about 1lb / 3 months. annual reports will tell about quantities of waste.

OUT TO STORAGE shed

Photo 8 Facing N. Former storage shed. All gone (incl. floor, etc.)

Photo 9 SE view of PCB transformers ~6. Been here about 2 years. Intend to put into service. Yellow stickers affixed: caution contains PCBs. ON gravel fill area.

⑥ MM 6/4/92

THO. 6.4.92, CONT'D

Photo 10 Waste tank storage inside fence on pad. Pad was flat, no secondary containment.

24 hr. security. Facility locked during non-working hrs.

1130 VSI tour complete. Back to lunchroom area w/ Tony. We will observe land use after leaving & meet Tony in LaFox to get add'l info. Take Kaneville to Kesslinger, go W., on left. about 4-5 miles from General facility.

1145 BUWST offsite for lunch

1320 BUWST @ LaFox Plant, meeting with Tony Dibling, again.

Answers to previous questions:

- 13 employees @ Cetron facility
- Tony has produced copies of Generator Annual Haz. waste reports

AMYL ACETATE: off-spec product (?)
Acetone & Methanol in small container

MM 6/4/92 ⑦

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
HRE-8J

May 21, 1992

Tony Dibling
Richardson Electronics
40 W. 267 Keslinger Road
La Fox, IL 60147

Re: Visual Site Inspection
Cetron Electronics Corp.
715 Hamilton Steet
Geneva, Illinois 60134
ILD 005 130 430

Dear Tony Dibling:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104 (e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs), and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment 1. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for June 4, 1992 at 9:00 am. The inspection team will consist of personnel of B&V Waste Science & Technology Corp., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francine Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kimberly A. Ogle for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Attachment

cc: Larry Eastep, IEPA, Springfield
Gliff Gould, IEPA, Maywood

mas/rfa

ATTACHMENT 1

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 0890350004 -- Kane County
Geneva/Richardson Electronics
ILD005130430
RCRA General

June 17, 1987

Karl E. Bremer, Chief
Technical Program Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Bremer:

Enclosed you will find the following:

1. The Initial Screening for Environmental Significance form for the above referenced facility.

2. A copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

The following form(s) were not on file at the IEPA for this facility:

3. Notification of Hazardous Waste Site (EPA Form 8900-1).

4. Preliminary Assessment (EPA Form 2070-12).

Based upon a review of the information available on the above referenced facility, the Agency has determined that this facility is not environmentally significant and that a Facility Management Plan should not be prepared. Please let us know if you do not agree with this determination.

If you have any questions regarding this initial screening, please contact Eugene W. Dingledine of my staff at 217/785-2892.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:jd/2818g/12-13

Enclosure

cc: Division File
USEPA Region V -- Mary Murphy
FOS Northern Region

Attachment 3

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

FACILITY NAME: RICHARDSON ELECTRONICS, CETRON

EPA I.D. NUMBER: 005130430

LOCATION CITY: 715 Hamilton Street, Geneva

STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
° Landfill		✓
° Surface Impoundment		✓
° Land Farm		✓
° Waste Pile		✓
° Incinerator		✓
° Storage Tank (Above Ground)		✓
° Storage Tank (Underground)		✓
° Container Storage Area		✓
° Injection Wells		✓
° Wastewater Treatment Units		✓
° Transfer Stations		✓
° Waste Recycling Operations		✓
° Waste Treatment, Detoxification		✓
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if avaliable.

N/A

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the part or still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released .
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases, Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. 1 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

George W. Snyder
Vice President-Facilities
Typed Name and Title

George W. Snyder
Signature

4-1-87
Date

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Cetron Div. of Richardson Electronics Ld.

EPA I.D. NUMBER: ILD005130430

LOCATION CITY: 715 Hamilton Street, Geneva

STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		Shown in Part A
° Storage Tank (Underground)		X
° Container Storage Area		Shown in Part A
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

LaMonte Walker - Support Services, Mgr.
Typed Name and Title

LaMonte Walker
Signature

February 3, 1986
Date